

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re: LTL MANAGEMENT, LLC,¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan
LTL MANAGEMENT LLC, Plaintiff, v. THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000, Defendants.	Adv. Proc. No.: 23-01092 (MBK)

**OBJECTION TO THE DEBTOR’S MOTION TO SEAL EXHIBITS
RELATED TO DEBTOR’S COMPLAINT FOR INJUNCTIVE RELIEF**

The Ad Hoc Committee of Certain Talc Claimants (the “AHC”) in the above captioned case, by and through its undersigned counsel, hereby respectfully submits this objection (the “Objection”) to LTL Management, LLC’s (the “Debtor” or “LTL”) *Motion for Entry of an Order Authorizing the Filing Under Seal of Certain Confidential Exhibits Related to Debtor’s Complaint for Injunctive Relief and Related Motion* (the “Seal Motion”)² [Docket No. 11] and respectfully states as follows:

BACKGROUND

1. The AHC incorporates by reference its *Informational Brief of the Ad Hoc Committee of Certain Talc Claimants Regarding Second Bankruptcy Filing by LTL Management, LLC* (the “AHC Informational Brief”) filed contemporaneously herewith.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Seal Motion.

OBJECTION

2. The Debtor seeks to file certain Confidential Documents, including Insurance Coverage Documents and Commercial Agreements, under seal. The Debtor intimates that this is a benign request given that “[t]he Confidential Documents are among those exhibits previously provided to the Court under seal... pursuant to which the Debtor requested and was granted the same injunctive relief as that sought by this adversary proceeding.” However, while the relief may be the same, the circumstances are certainly not. As set forth in the AHC Informational Brief, this bankruptcy case is fraudulent, the petition was filed in bad faith, and the Court lacks jurisdiction and should not exercise jurisdiction over the case or any matters at this time. The *Debtor’s Verified Complaint for Declaratory and Injunctive Relief (I) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction* [Docket No. 1] filed in the above captioned adversary proceeding to stay all litigation against non-debtor J&J and other non-debtor defendants is a thinly veiled attempt to further delay justice for J&J’s victims. This has been J&J’s tactic for decades outside of bankruptcy, and nearly 18 months in bankruptcy. J&J will undoubtedly continue to pursue delay as a litigation strategy for as long as it can get away with it. The adversary proceeding should be dismissed, and the relief requested in the Seal Motion not be granted. The AHC objects to the sealing of the Confidential Documents, and requests that the Court deny the Seal Motion.

RESERVATION OF RIGHTS

3. The Committee reserves all rights to amend or supplement this Objection.

CONCLUSION

WHEREFORE, for foregoing reasons, the AHC respectfully requests that the Court (i) deny the relief requested in the Seal Motions; (ii) and grant such other and further relief as is just and proper.

Respectfully submitted,

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